

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SARAH PALIN, an individual,

Plaintiff,

– against –

THE NEW YORK TIMES COMPANY,
a New York corporation, and JAMES
BENNET, an individual,

Defendant.

No. 17 Civ. 4853

Hon. Jed S. Rakoff

ECF Case

DECLARATION OF SHANE B. VOGT

SHANE B. VOGT, pursuant to 28 U.S.C. § 1746, hereby declares and says:

1. I am an attorney licensed to practice law in the State of Florida, specially admitted to practice in this Court [Doc. 13] and a partner in the law firm of Bajo Cuva Cohen Turkel, P.A., counsel of record for plaintiff in the above-captioned matter, Sarah Palin.

2. I submit this Declaration in support of Plaintiff's Memorandum of Law in Support of Motion for Partial Summary Judgment [Doc. 100].

3. Attached hereto as **Exhibit A** is a true and authentic copy of an article entitled "*The last decade showed how social medial could topple governments and make social change – it's only getting crazier from here,*" which can be found at <https://www.businessinsider.com/social-media-activism-facebook-twitter-youtube-power-2019-12>.

4. Attached hereto as **Exhibit B** is a true and authentic copy of an article entitled "*Social Media Transformed Teens' Ability to Build Activist Movements Online,*" which can be found at <https://www.teenvogue.com/story/social-media-activism-changed->

[everything#:~:text=Social%20Media%20Transformed%20Teens'%20Ability%20to%20Build%20Activist%20Movements%20Online,-To%20mark%20the&text=She%20told%20Teen%20Vogue%20she,and%20that%20existed%20for%20them.%E2%80%9D.](#)

5. Attached hereto as **Exhibit C** is a true and authentic copy of an article entitled “*Social media is the new heart of political protests*,” which can be found at <https://apnews.com/b31f49aa9610429488ebad63caa63f6d/Social-media-is-the-new-heart-of-political-protests>.

6. Attached hereto as **Exhibit D** is a true and authentic copy of an article entitled “*March for Our Lives was Born on Social Media*,” which can be found at <https://www.brandwatch.com/blog/march-for-our-lives-social-media/>.

7. Attached hereto as **Exhibit E** is a true and authentic copy of an article entitled “*The Woman’s March: Why We Marched*,” which can be found at <https://www.brandwatch.com/blog/womens-march-why-we-marched/>.

8. Attached hereto as **Exhibit F** is a true and authentic copy of an article entitled “*George Floyd Video – Teen Who Recorded It... GETTING PSYCHOLOGICAL HELP*,” which can be found at <https://www.tnz.com/2020/06/02/george-floyd-video-teen-witness-getting-therapy-helping-investigation/>.

9. Attached hereto as **Exhibit G** is a true and authentic copy of an article entitled “*Who Is Darnella Frazier, the 17-Year-Old Who Filmed George Floyd’s Fatal Arrest?*,” which can be found at <https://www.insideedition.com/who-is-darnella-frazier-the-17-year-old-who-filmed-george-floyds-fatal-arrest-60134>.

10. Attached hereto as **Exhibit H** is a true and authentic copy of an article entitled “*King’s Letter from Birmingham Jail, 50 Years Later*,” which can be found at <https://www.history.com/news/kings-letter-from-birmingham-jail-50-years-later>.

11. Attached hereto as **Exhibit I** is a true and authentic copy of an article entitled “*Harvey Shapiro, Poet and Editor, Dies at 88*,” which can be found at <https://www.nytimes.com/2013/01/08/books/harvey-shapiro-poet-of-new-york-and-beyond-dies-at-88.html>.

12. Attached hereto as **Exhibit J** is a true and authentic copy of *Wikipedia* page for Greta Thunberg, which can be found at https://en.wikipedia.org/wiki/Greta_Thunberg.

13. Attached hereto as **Exhibit K** is a true and authentic copy of an article entitled “*Greta Thunberg’s Online Attackers Reveal a Grim Pattern*,” which can be found at <https://www.wired.com/story/greta-thunberg-online-harassment/>.

14. Attached hereto as **Exhibit L** is a true and authentic copy of an article entitled “*Online haters are targeting Greta Thunberg with conspiracy theories and fake photos*,” which can be found at <https://www.usatoday.com/story/news/nation/2019/10/02/climate-change-activist-greta-thunberg-targeted-online-trolls/3843196002/>.

15. Attached hereto as **Exhibit M** is a true and authentic copy of an article entitled “*The School Shooting Generation Has Had Enough*,” which can be found at <https://time.com/longform/never-again-movement/>.

16. Attached hereto as **Exhibit N** is a true and authentic copy of an article entitled “*CAMERON KASKY, JACLYN CORIN, DAVID HOGG, EMMA GONZALEZ AND ALEX WIND*,” which can be found at <https://time.com/collection/most-influentia-people-2018/5217568/parkland-students/>.

17. Attached hereto as **Exhibit O** is a true and authentic copy of an article entitled “*Parkland Students Find Themselves Targets of Lies and Personal Attacks*,” which can be found at <https://www.nytimes.com/2018/03/27/us/parkland-students-hogg-gonzalez.html>.

18. Attached hereto as **Exhibit P** is a true and authentic copy of an article entitled “*The Sliming of David Hogg and Emma Gonzalez*,” which can be found at <https://www.gq.com/story/the-sliming-of-david-hogg-and-emma-gonzalez>.

19. Attached hereto as **Exhibit Q** is a true and authentic copy of the *Twitter* Terms of Service, which can be found at <https://twitter.com/en/tos>.

20. Attached hereto as **Exhibit R** is a true and authentic copy of the *Facebook* Terms of Service, which can be found at <https://www.facebook.com/terms.php>.

21. Attached hereto as **Exhibit S** is a true and authentic copy of the *Facebook* Community Standards, which can be found at <https://www.facebook.com/communitystandards/>.

22. Attached hereto as **Exhibit T** is a true and authentic copy of *Facebook* Community Standards, Section IV.21 False News, which can be found at https://www.facebook.com/communitystandards/false_news.

23. Attached hereto as **Exhibit U** is a true and authentic copy of an article entitled “*Hard Questions: What’s Facebook’s Strategy for Stopping False News?*,” which can be found at <https://about.fb.com/news/2018/05/hard-questions-false-news/>.

24. Attached hereto as **Exhibit V** is a true and authentic copy of the *Instagram* Terms of Use, which can be found at <https://help.instagram.com/581066165581870>.

25. Attached hereto as **Exhibit W** is a true and authentic copy of an article entitled “*60 Incredible and Interesting Twitter Stats and Statistics*,” which can be found at <https://www.brandwatch.com/blog/twitter-stats-and->

[statistics/#:~:text=There%20are%20330m%20monthly%20active,users%20write%2080%25%20of%20tweets.](#)

26. Attached hereto as **Exhibit X** is a true and authentic copy of an article entitled “*Americans favor mobile devices over desktops and laptops for getting news*,” which can be found at <https://www.pewresearch.org/fact-tank/2019/11/19/americans-favor-mobile-devices-over-desktops-and-laptops-for-getting-news/>.

27. Attached hereto as **Exhibit Y** is a true and authentic copy of an article entitled “*Social media outpaces print newspapers in the U.S. as a news source*,” which can be found at <https://www.pewresearch.org/fact-tank/2018/12/10/social-media-outpaces-print-newspapers-in-the-u-s-as-a-news-source/>.

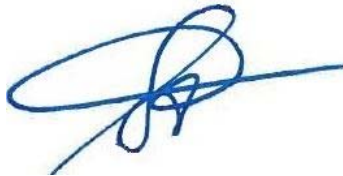
28. Attached hereto as **Exhibit Z** is a true and authentic copy of an article entitled “*The spread of true and false news online*,” which can be found at <https://science.sciencemag.org/content/359/6380/1146/tab-pdf>.

29. Attached hereto as **Exhibit AA** is a true and authentic copy of an article entitled “*How Fake News Goes Viral: A Case Study*,” which can be found at <https://www.nytimes.com/2016/11/20/business/media/how-fake-news-spreads.html>.

30. Attached hereto as **Exhibit BB** is a true and authentic copy of an article entitled “*The Grim Conclusions of the Largest-Ever Study of Fake News*,” which can be found at <https://www.theatlantic.com/technology/archive/2018/03/largest-study-ever-fake-news-mit-twitter/555104/>.

I HAVE READ EVERY STATEMENT MADE IN THIS DECLARATION AND DECLARE
UNDER PENALTY OF PERJURY THAT EACH STATEMENT IS TRUE AND CORRECT.

June 19, 2020
Date

A handwritten signature in blue ink, appearing to read 'Shane Vocht', is written over a horizontal line.

SHANE VOGT